

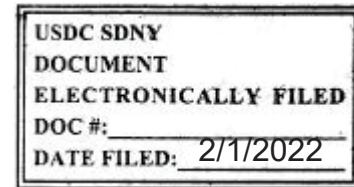
JacksonLewis

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January 28, 2022

VIA ECF

Honorable Alison J. Nathan
United States Magistrate Judge
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, New York 10007



Re: Pang v. Cushman & Wakefield, et al.
Case No. 1:20-cv-10019 (AJN) (SN)

Dear Judge Nathan:

We represent Defendants in the above-referenced matter. We submit this letter pursuant to Your Honor's January 24, 2022 Order [ECF No. 76]. We sought the approval of Pro Se Plaintiff to the contents of this letter; however, Plaintiff Pro Se has not consented and advised us that he would prefer this letter be sent after Magistrate Judge Sarah Netburn decides his Motion to Compel [ECF No. 76]. A copy of email correspondence between Plaintiff and Defendants' counsel is attached hereto as Exhibit "A."

On December 15, 2021, Magistrate Judge Netburn held a conference to discuss Plaintiff's Motion to Amend the Complaint and outstanding discovery disputes. [ECF No. 74]. Plaintiff's Motion to Amend the Complaint was denied, and Plaintiff's request to conduct further discovery was denied. All fact discovery is now completed.

The parties are also scheduled to participate in a settlement conference with Magistrate Judge Netburn on February 11, 2022. [ECF No.74].

Both parties intend to move for summary judgment. At the December 15, 2021 conference, the following Summary Judgment briefing schedule was approved by Magistrate Judge Sarah Netburn: Defendants' Motion for Summary Judgment shall be filed by March 1, 2022, Plaintiff's Cross-Motion for Summary Judgment shall be filed by March 31, 2022, Defendants' Reply and Opposition shall be filed by April 14, 2022, and Plaintiff's Reply shall be filed April 28, 2022. [ECF No. 74].

In light of the upcoming settlement conference, the Parties respectfully request that the post-discovery status conference be rescheduled to a date after February 11, 2022 and that the Court adopt and approve of the proposed Summary Judgment briefing schedule.

**SO
ORDERED**

**The conference scheduled for
February 4, 2022 is adjourned
to February 25, 2022 at 3:30
p.m.**

A handwritten signature in black ink, appearing to read "Alison J. Nathan".

1/28/2022

JacksonLewis

Honorable Alison J. Nathan
January 28, 2022
Page 2

We thank the Court for its attention to this matter.

Respectfully submitted,



JACKSON LEWIS, P.C.

Mary A. Smith, Esq.

(914) 872-6907

Mary.Smith@jacksonlewis.com

cc: Ivan To Man Pang (via ECF, email and regular mail)
Caterina Catalano, Esq.

EXHIBIT A

From: To-Man Pang <toman33@hotmail.com>
Sent: Thursday, January 27, 2022 2:34 PM
To: Catalano, Caterina (White Plains); Smith, Mary A. (White Plains)
Subject: Re: Pang v. Cushman Wakefield et al. 20-cv-10019 (AJN)(SN)

[EXTERNAL SENDER]

Ms. Catalano,

I don't see Judge Nathan's Order responding anything to my order. I do not agree.

Thanks
Ivan

From: Catalano, Caterina (White Plains) <Caterina.Catalano@jacksonlewis.com>
Sent: Thursday, January 27, 2022 2:16 PM
To: To-Man Pang <toman33@hotmail.com>; Smith, Mary A. (White Plains) <Mary.Smith@jacksonlewis.com>
Subject: RE: Pang v. Cushman Wakefield et al. 20-cv-10019 (AJN)(SN)

Hi Mr. Pang,

Judge Nathan's Order was made in response to your motion, and ordered both parties to file a joint letter by tomorrow. Because we are scheduled to participate in a settlement conference on February 11th, we could reschedule the post-discovery conference for a date after then. Please let us know if this is agreeable.

Thanks,
Caterina



Caterina Catalano

Attorney at Law

Jackson Lewis P.C.

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White Plains, NY 10601

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Caterina.Catalano@jacksonlewis.com | www.jacksonlewis.com

From: To-Man Pang <toman33@hotmail.com>
Sent: Thursday, January 27, 2022 2:08 PM
To: Catalano, Caterina (White Plains) <Caterina.Catalano@jacksonlewis.com>; Smith, Mary A. (White Plains) <Mary.Smith@jacksonlewis.com>
Subject: Re: Pang v. Cushman Wakefield et al. 20-cv-10019 (AJN)(SN)

[EXTERNAL SENDER]

Ms. Catalano,

Please wait until what Judge Netburn's decision about my motion.

Thank you
Ivan

From: Catalano, Caterina (White Plains) <Caterina.Catalano@jacksonlewis.com>
Sent: Thursday, January 27, 2022 12:36 PM
To: To-Man Pang <toman33@hotmail.com>; Smith, Mary A. (White Plains) <Mary.Smith@jacksonlewis.com>
Subject: RE: Pang v. Cushman Wakefield et al. 20-cv-10019 (AJN)(SN)

Hi Mr. Pang,

Please find attached our draft letter to Judge Nathan's January 24, 2022 Order. Please let us know if you agree with the letter. If you agree, we can file with the Court.

Thank you,
Caterina



Caterina Catalano

Attorney at Law

Jackson Lewis P.C.

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Caterina.Catalano@jacksonlewis.com | www.jacksonlewis.com

From: To-Man Pang <toman33@hotmail.com>
Sent: Monday, January 24, 2022 2:28 PM
To: Catalano, Caterina (White Plains) <Caterina.Catalano@jacksonlewis.com>; Smith, Mary A. (White Plains) <Mary.Smith@jacksonlewis.com>
Subject: Re: Pang v. Cushman Wakefield et al. 20-cv-10019 (AJN)(SN)

[EXTERNAL SENDER]

Hi Ms. Catalano,

Sorry, I didn't see your email until now. I already filed to the court. If you still want to speak to me, you can call me at 917-940-8942.

Thanks

Ivan Pang

From: Catalano, Caterina (White Plains) <Caterina.Catalano@jacksonlewis.com>
Sent: Monday, January 24, 2022 11:30:44 AM
To: To-Man Pang <toman33@hotmail.com>; Smith, Mary A. (White Plains) <Mary.Smith@jacksonlewis.com>
Subject: RE: Pang v. Cushman Wakefield et al. 20-cv-10019 (AJN)(SN)

Hello Mr. Pang,

I am available at any time today to meet and confer about your requests before you file your motion with the Court. Please let me know if you are available.

Thank you,
Caterina



Caterina Catalano

Attorney at Law

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Caterina.Catalano@jacksonlewis.com | www.jacksonlewis.com

From: To-Man Pang <toman33@hotmail.com>

Sent: Monday, January 24, 2022 10:18 AM

To: Catalano, Caterina (White Plains) <Caterina.Catalano@jacksonlewis.com>; Smith, Mary A. (White Plains) <Mary.Smith@jacksonlewis.com>

Subject: Re: Pang v. Cushman Wakefield et al. 20-cv-10019 (AJN)(SN)

[EXTERNAL SENDER]

Ms. Smith and Ms. Catalano,

Attached please find my letter file to the court today.

Regards,
Ivan

From: Catalano, Caterina (White Plains) <Caterina.Catalano@jacksonlewis.com>

Sent: Friday, January 21, 2022 5:45 PM

To: Smith, Mary A. (White Plains) <Mary.Smith@jacksonlewis.com>; To-Man Pang <toman33@hotmail.com>

Subject: RE: Pang v. Cushman Wakefield et al. 20-cv-10019 (AJN)(SN)

Hello Mr. Pang,

Please find attached:

1. Defendants' Letter in response to your January 5, 2022 email; and
2. Defendants' Objections and Responses to your Seventh Interrogatories and Document Requests.

Thank you,
Caterina



Caterina Catalano

Attorney at Law